

# VANDEVENTER BLACK LLP

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December 1, 2016

**Via E-mail**

Edward R. Theobald, Esq.  
135 S. LaSalle Street, Suite 1920  
Chicago, IL 60603  
Bears51@aol.com

**Re: *Janice Keen v. Teva Sales and Marketing, Inc., et al.*  
Case Nos. 1:14-cv-09626 and 1:16-cv-09964**

Dear Mr. Theobald:

My firm represents James A. Scott & Son, Incorporated, doing business as Scott Insurance ("Scott Insurance"). I am in receipt of a Subpoena to Produce Documents, Information, or Objects, issued from the United States District Court for the Northern District of Illinois in the above-referenced matters, which was sent via FedEx and received in Scott Insurance's Richmond, Virginia office location on November 17, 2016 (the "Subpoena"). A copy of the referenced Subpoena is attached.

Pursuant to Federal Rule of Civil Procedure 45, Scott Insurance asserts the following objections to the Subpoena:

- (1) The Subpoena requires compliance outside of the geographical limits specified by Fed. R. Civ. P. 45(c)(2)(A). The Subpoena requires compliance in Chicago, which is more than 100 miles from Scott Insurance's office in Richmond, Virginia;
- (2) The Subpoena imposes an undue burden on Scott Insurance;
- (3) The Subpoena fails to allow a reasonable amount of time to comply;
- (4) The Subpoena seeks the production of documents that were prepared in anticipation of litigation or for trial, and are subject to protection as trial-preparation materials. These documents include claim reports, e-mails, and notes of telephone calls prepared in anticipation of litigation and discussing litigation strategies; and
- (5) Scott Insurance objects to producing any privileged attorney-client communications.

Scott Insurance has asserted the objections which are apparent to it at this time. Scott Insurance expressly reserves the right to assert objections that may become apparent at a later date.

I understand that, during a phone call with Nancy Keaton at Scott Insurance, you agreed to extend Scott Insurance's deadline to respond to the Subpoena until December 8, 2016. In accordance with that agreement, and subject to and without waiving the foregoing objections, Scott Insurance will serve all non-protected, non-privileged documents responsive to the Subpoena by December 8, 2016.

**EXHIBIT**  
**C**

December 1, 2016

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If you have any questions, please don't hesitate to contact me.

Best regards,

A handwritten signature in black ink, appearing to read "S. Golden", written in a cursive style.

Sean M. Golden

cc (by e-mail): Nancy Keaton, LPCS, CCLA  
Larry Rappoport, Esq.  
Douglas Palais, Esq.